

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

DESMOND BABLOO SINGH,

Defendant.

CRIMINAL NO. RDB-21-0116

*
*
*
*
*
*
*
*
*

CONSENT MOTION FOR ENTRY OF A PROTECTIVE ORDER

Pursuant to Rules 16(d) and 49.1 of the Federal Rules of Criminal Procedure and 18 U.S.C. § 3771, the United States moves this Court for entry of a protective order that will ensure the confidentiality of certain information, including sealed court documents, evidence relating to ongoing investigations, grand jury materials, personal identity information, and other sensitive, victim-related information.


Defense counsel and the government have requested discovery under Fed. R. Crim. P. 16(a) and (b). Entry of a protective order restricting the use, dissemination, and disposition of materials containing sensitive information is required in this case to permit the United States to provide discovery to the defendant while also protecting information related to ongoing investigations, materials currently filed under seal, personal identifying information, and sensitive victim-related information, *e.g.*, photographs/images and other media files.

The United States and defense counsel have conferred in accordance with Fed. R. Crim. P. 16.1 regarding discovery and the draft protective order proposed by the United States, and have reached an agreement with respect to all of the provisions contained therein.

The parties therefore request that the Court issue the proposed Protective Order to facilitate an expeditious discovery process. A copy of the proposed Protective Order is attached hereto.

Respectfully submitted,

Jonathan F. Lenzner
Acting United States Attorney

By: 

Christopher M. Rigali
Zachary A. Myers
Assistant United States Attorneys